

September 14, 2021

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554



RE: The Emergency Broadband Benefit Program, WC Docket No. 20-445

Dear Ms. Dortch:

Next Century Cities is a nonprofit 501(c)(3) coalition of over 200 member municipalities across the United States, including the City of Baltimore, that works to bring fast, affordable, and reliable broadband to residents. We work on behalf of local elected officials, their appointees, and community leaders, advocating for telecommunications policies that support connectivity in every community.

On September 10, 2021, nonprofit leaders, city officials, community leaders, and broadband advocates met with the Acting Chairwoman Rosenworcel, Acting Chief Policy Advisor Kate Black, Acting Special Advisor to the Chairwoman and Deputy Bureau Chief of the Wireline Competition Bureau Trent Harkrader, Press Secretary Paloma Perez, and Associate Bureau Chief of the Consumer and Governmental Affairs Bureau Eduard Batholme via video conference to discuss the Emergency Broadband Benefit program successes and implementation challenges among Baltimore residents. The following broadband advocates and community leaders were in attendance:

- amalia deloney, Vice President, Robert W. Deutsch Foundation
- Jason Hardebeck, Director of Broadband and Digital Equity, City of Baltimore
- Catalina Rodriguez Lima, Director, Mayor's Office of Immigrant Affairs, City of Baltimore ("MIMA")
- Lydia Walther-Rodriguez, Baltimore Regional Director, CASA de Maryland



- Rachel Brooks, Lead Organizer, Baltimoreans United in Leadership Development (“BUILD”)
- Francella Ochillo, Executive Director, Next Century Cities
- Ryan Johnston, Policy Counsel, Federal Programs, Next Century Cities
- Corian Zacher, Policy Counsel, State and Local Initiatives, Next Century Cities

The Emergency Broadband Benefit Program’s (“EBB”) launch on May 12, 2021, marked a turning point in federal policymaking. It was an opportunity for the Commission, local and state officials, private stakeholders and other member of the public to brainstorm new ways to bring affordable broadband within reach for low-income households. The EBB continues to have a positive impacted many communities nationwide, but persistent challenges to accessing the benefit limit full participation. According to community leaders, this is especially true in Baltimore, Maryland.

With a population of more than half a million residents, only 40.7% of Baltimoreans do have access to a broadband subscription.¹ This means that almost 96,000 individuals citywide do not have access to a broadband subscription.² Additionally, 33.3% or 75,000 residents do not have access to a computer.³ The EBB was designed to address both of these challenges.

¹ Stephen Babcock, *Report: 40% of Baltimore households lack wireline internet access*, Technical.ly (May 13, 2020), <https://technical.ly/baltimore/2020/05/13/abell-foundation-report-40-percent-baltimore-households-lack-wireline-internet-access-digital-divide/>.

² *Id.*

³ John B. Horrigan, *Baltimore’s Digital Divide: Gaps in Internet Connectivity and the Impact on Low-Income City Residents* (2020), [https://abell.org/sites/default/files/files/2020_Abell_digital%20divide_full%20report_FINAL_web%20\(dr\).pdf](https://abell.org/sites/default/files/files/2020_Abell_digital%20divide_full%20report_FINAL_web%20(dr).pdf).



However, according to the FCC’s zip3 data, only 34,734 households in the Baltimore area have registered for the program.⁴ As Jason Hardebeck stated, nearly half of Baltimore’s students lack wireline access at home. Community advocates added specific lessons learned from working to facilitate EBB enrollment, ongoing challenges that curb program participation, and new conversations about digital equity.

Lessons Learned and Successes from EBB Implementation

First, city and nonprofit leaders discussed the lessons they learned through EBB community advocacy. As Ms. Rodriguez Lima shared a recurring theme, “[t]here is also an element of fear when applying to a federal resource. We are still struggling with the chilling effect of the Public Charge.” Additionally, Ms. Walther-Rodriguez highlighted that “having a trusted point of contact for community members to call has made it easier to help wary residents enroll in the program.”

For many eligible residents, both in Baltimore and nationwide, there is an inherent distrust of programs or opportunities that seem “too good to be true,” especially when providers promote the EBB through marketing materials and sales representatives may attempt to upsell customers. Advocates urged the FCC to recognize that community-level organizations need funding opportunities to conduct community outreach and could be helpful in the Commission’s public awareness campaigns. These advocacy groups work directly with many of the communities that would benefit the most from new affordability

⁴ Universal Service Administrative Corporation, *Emergency Broadband Benefit Enrollment and Claims Tracker*, <https://www.usac.org/about/emergency-broadband-benefit-program/emergency-broadband-benefit-program-enrollments-and-claims-tracker/> (last visited Sept. 11, 2021).



programs and can reach households that the Commission is unable to reach.

The FCC's Outreach Toolkit provides important resources for community leaders. Community leaders shared why more specific outreach materials could mobilize outreach efforts for those who work closely with EBB-eligible residents but lack the capacity to develop tailored messaging. Also, localized, context-specific, messaging could better enable community organizations to help promote the program.

Even with robust community-level EBB promotion, cities alone cannot address persistent disincentives to universal connectivity. As Mr. Hardebeck explained,

Subsidies alone will not reverse the structural disinvestment that underlies the digital divide in our urban centers. While the EBB combats a symptom of a much larger problem, municipalities must be encouraged to consider access as critical public infrastructure and make the investments necessary to commoditize what has become a basic tenet of modern civil society.

Second, community leaders spoke about the EBB's positive impacts on Baltimore residents. Specifically, Ms. Rodriguez Lima thanked the Commission for making it clear that a Social Security Number ("SSN") was not needed for enrollment in the EBB.

In one household that MIMA assisted in applying for the program, none of the family members had a SSN. In this case, the household was applying based on her child's ability to access free and reduced meals at school. The application prompted additional identifying information from the child, who did not have a SSN or ID for verification. After MIMA reached out to the FCC, they directed the family to provide four zeros into the form and enroll for support. Ms. Rodriguez Lima highlighted how some resources are unavailable



for families without SSN, or Individual Taxpayer Identification Numbers, and the EBB provides a key lifeline for these families.

Ms. Rodriguez Lima also highlighted the crucial role of community-based EBB enrollment support. Without MIMA's institutional knowledge of the program and the FCC's processes, many families may not have been able to complete the application process or might have faced extensive delays. While community-based organizations in Baltimore are well familiar with the program, similarly situated applicants across the country are unable to complete enrollment without trusted community contacts who are knowledgeable about administrative hurdles.

The EBB & New Digital Equity Opportunities

While the import of the EBB program is to make broadband more affordable for eligible households, the program development and promotion process has shed light on many of the root causes of the digital divide. Speaking on behalf of BUILD a non-partisan, interfaith, multiracial community organization, Ms. Brooks stated that “the EBB has been essential in that it has forced a conversation among talented, radical leaders who have been creating and organizing their way around these intentional divides for the last four decades, that their digital rights are their human rights. This [EBB] subsidy is really a lifeline.”

Brooks emphasized that without programs such as the EBB, some Baltimore communities would not have had to look at exactly where service is and whether it is affordable. She stated, “We have to break down the wall digitally, just like we had to do in real life.”



Community outreach aimed at promoting the EBB made it impossible to ignore increasing digital divides. As Brooks poignantly explained, for many in the communities that BUILD serves, every extra dollar goes to keeping the lights on, the heat running, and the landlord happy. Especially in neighborhoods where service is unavailable or ineffective, community members have not been able to make broadband a priority.

Pairing outreach for EBB with other social services is an underutilized tactic that has multifarious benefits. Community advocates also discussed how the EBB has transformed many Baltimore organizations that are not technology focused into advocates for tech-based programs. Ms. Walther-Rodriguez highlighted CASA's work with COVID-19 vaccine clinics. She noted that her organization was able to provide information and EBB information and enrollment support to those who were waiting in line to receive a COVID-19 vaccine.

Notably, community advocacy groups are often the front lines for people seeking resources about public benefits. Many community advocacy groups are not primarily technology-based organizations and face a learning curve when becoming familiar with FCC protocol. Ensuring that informational resources are available to help these groups serve as liaisons between the FCC and local communities is critical.

Community advocates highlighted that EBB outreach funding is a critical resource that has been in short supply. Ms. Rodriguez Lima expressed her concerns noting that “[w]e had underestimated the level of support needed by our families to access this program. . . .”



Ms. deloney agreed, highlighting but for two foundations in Baltimore there would have been no funded EBB outreach programs. Mr. Hardebeck also explained that it has taken several months to develop more effective outreach strategies. Advocates supported the suggestion that for any new affordability programs the Commission undertakes, money to help fund community level outreach should be baked in from the very beginning.

Few municipalities have the type of philanthropic support for community outreach efforts that are present in Baltimore. Throughout the meeting, community leaders highlighted the need for funding to support outreach with immigrant and other historically hard to reach populations in any new low-income programs. One of the largest challenges that the community advocates agreed on is that there is a serious lack of outreach to the populations they serve. Additional resources for community outreach would not only bolster low-income programming, but it would also capitalize on their existing local relationships and expertise while expanding connectivity.

Language and Administrative Barriers Interfere With Enrollment

Community advocates also shared several of the challenges they faced in helping their communities enroll in the EBB. Ms. Rodriguez Lima shared that one of the largest challenges that MIMA faced was the difficulty of finding the application in Spanish. She noted that USAC's landing page does not have a visible option for Spanish speakers. "You must click the "apply" button, which is in English, before a Spanish option is available." She also noted that the application and assistance hotline have limited language capacity beyond English and Spanish, which is a problem for other Limited English Proficient



eligible families.

Similarly, advocates shared concerns over lack of service provider language availability and consumer support. Ms. Rodriguez Lima shared that in her discussions with immigrant families there is often confusion when contacting internet service providers for help with the application process. Often, providers have limited capacity to assist consumers outside of English and Spanish. Ms. Rodriguez Lima urged the Commission to consider requiring that EBB participating providers to comply with language access laws. This will help minimize discrimination based on language and ensure that everyone who is eligible has equitable access to enrollment resources.

There also remains a disconnect between the application process and election of a service provider. Ms. Walther-Rodriguez noted, many members of the community in which she works were able to complete the application process. However, they did not understand the secondary process of selecting a provider to receive service. While the Commission has taken steps to clarify this part of the process, language barriers continue to leave many consumers confused and unable to receive service.

Ms. Brooks noted that the Commission has taken the important step of releasing participating provider data across all 50 states. Although, she highlighted that it is impossible to tell how quality of service changes from provider to provider. It is difficult for vulnerable consumers to know when they are being upsold, downsold, or if the service they are receiving will meet their needs.



Community leaders can support residents who face difficulties completing the enrollment process but cannot reach everyone who needs support. Canvassing and community presentations are resource intensive. Ms. Walther-Rodriguez stressed the importance of a case management system to ensure that residents retain trusted support throughout the process. She further described the increased response when EBB outreach was paired with other relief efforts.

As the school year begins, Baltimore City schools have had to choose between whether to advertise the EBB and potentially risk losing Emergency Connectivity Fund ("ECF") support or not. Mr. Hardebeck emphasized that schools in Baltimore sought to address student connectivity challenges through the ECF. He shared that almost 40,000 public school students in Baltimore lack wireline access at home. However, uncertainty about whether the ECF and EBB are mutually exclusive led the school district to make an active decision not to advertise the EBB.

Advocates noted that schools are an efficient way to distribute EBB information to numerous eligible households. They urged the Commission to make certain that future programs can be utilized without fear that it will jeopardize other sources of connectivity funding. Collectively, both programs can maximize connectivity support for students, but participation in one should not undermine the other. Both are necessary to achieve robust broadband access and adoption.



Community Organizations Invite Collaboration with the Commission

Each community advocate highlighted an area where they would invite the FCC to collaborate with their organization. Mr. Hardebeck shared that the City of Baltimore is in the process of developing a strategy to deploy a municipal network. He highlighted that the network's primary goals are to increase competition and expand access to every neighborhood in the city. He emphasized that "Baltimore cannot miss this historic opportunity to ensure the city's digital infrastructure is future-proof, globally competitive and leaves no one on the far side of the digital divide." He invited the Commission to collaborate with the city government on additional strategies and programs they could utilize to address these fundamental changes.

Mr. Hardebeck also invited the Commission to collaborate on ways to ensure that those who do not need to pay for low-income plans are not doing so. He highlighted that many in Baltimore are on providers' low-income plans but are not enrolled in the EBB and invited the Commission to do more meetings with local officials and advocates to ensure that providers are conducting outreach as they claim.

Finally, community advocates invited collaboration with the Commission, particularly on digital redlining. Ms. Brooks shared a story of a local pastor in the Baltimore community who was directly impacted by digital redlining. She detailed his experience:

A pastor in our congregation was meeting with a community member, he was exposed to COVID. To figure out how to get tested, he tried to log online, his phone was out of data that day. His expensive internet package was down, and his 4 kids were not able to go to school that day. He got in



his car but couldn't find a business open with WiFi. He tried going to a neighbor's house but the whole block's internet was impossible to use. He drove out to the county in desperation, and as soon as he crossed the literal fiber line that segregates Baltimore from Baltimore County, he was connected and found a place to get tested.

Inside the beltway, digital redlining is often thought of as a theoretical phenomenon that happens in other places. “For those working in the communities experiencing digital redlining, it is equivalent to a lack of healthcare, a lack of housing, a lack of food, and a lack of participation,” said Brooks. Ms. Brooks then invited the Commission to collaborate with them as they work to identify the root causes of digital redlining and combat the effects.

Next Century Cities urged the Commission to use it as a resource for connecting with the local officials. Local expertise and manpower will be a critical success factor in future programs. Both of our organizations are united in the goal to ensure that new broadband opportunities meet Americans' needs regardless of geography, topography, or income-level.

Respectfully submitted,

/s/ _____

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